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BY ECF

Hon. Mark W. Pedersen
United States District Court
Western District of New York
100 State Street
Rochester, New York 14614

Re: *Beall v. Corning Community College*
Civil Action No. 19-cv-06548

Dear Judge Pedersen:

After the parties completed the first six depositions in this case, the parties each served additional discovery demands and want to respond to those demands prior to completing the remaining depositions. According, the parties jointly request that the deadlines in the scheduling order be modified as follows:

- All motions to compel shall be filed by June 10, 2022.
- All factual discovery, including depositions, shall be completed by June 24, 2022.
- Plaintiff shall identify any expert witnesses through interrogatories and provide reports pursuant to Fed. R. Civ. P. 26 by July 29, 2022.
- Defendant shall identify any expert witnesses through interrogatories and provide reports pursuant to Fed. R. Civ. P. 26 by September 30, 2022.
- All parties shall complete all discovery relating to experts, including depositions, by November 11, 2022.
- Dispositive motions, if any, shall be filed no later than January 13, 2023.

Thank you for your consideration of these requests.

Very truly yours,

BOND, SCHOENECK & KING, PLLC

/s/ Katherine McClung

Katherine McClung

KM/jcg

cc: Stan Matusz, Esq.